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Sent: Tuesday, June 27, 2017 8:18 AM

To: Comments, Urc

Cc: Nick Melloh; Craig Martin; Josh Hannoy; Jeff Hardin; Keith Spence; Jessica Price; Kurt

Schneider; David Horney

Subject: IURC Technical Conference- Questions re: Implementation of Net Metering Legislation

(SEA 309)

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Good Morning, the following are questions re: the implementation of Net Metering Legislation (SEA 309):

Many of the concerns/questions we field relate to a completed project or installed project and specifically how that is defined. Per the language contained in SEA 309,

Provides that a customer that installs a net metering facility on the customer's premises before January 1, 2018, and that is participating in an electricity supplier's net metering tariff on December 31, 2017, shall continue to be served under the terms and conditions of the net metering tariff until: (1) the customer removes from the customer's premises or replaces the net metering facility; or (2) July 1, 2047; whichever occurs earlier, the consensus is that if the customer has an interconnection agreement and an installed project they will continue to be served as stated above, thru July 1, 2047. Please confirm in detail.

- What constitutes the <u>installation</u> of a net metering facility, and more specifically, when is the project recognized as it relates to starting the Net Metering timeframe?
 - i.e., if customer receives interconnection and installs the net metering project in 2017, but IOU does not set their meter or inspect the project is the project deemed incomplete and therefore not recognized for Net Metering Tariff thru July 1, 2047?
- Define Installs as it pertains to a net metering project. Our customers want to know what constitutes an installation.
- What is the timeframe that an IOU has to approve interconnection?
- What is the timeframe that an IOU has to respond to setting the meter and performing a site inspection?
- What prevents IOU's from dragging their feet and delaying a project past January 1, 2018?
- One IOU stated that if our customer has an interconnection agreement in place by 12/31/2017 and the project is under construction by that date they will honor the tariff thru July 1, 2047. Is that true?
- Another IOU stated that the customer must have the interconnection, the project built, the meter set and the site inspection completed by IOU before installation qualifies for tariff.
 - o Again, what if IOU's drag their feet?
- Can the IURC help IOU's define 'install'? It would be fair if the project had interconnection and was under construction by 12.31.2017, as that mitigates customer risk and exposure to IOU delays.

We have 6 customers that are working thru interconnection right now with 3 different IOU's. Each IOU seems to have a different interpretation regarding the tariff and what an installation is. This is causing undue risk and concern that can be mitigated with a fair definition of an installation. The IOU's got SEA 309 approved, it seems only fair that we eliminate the gray.

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